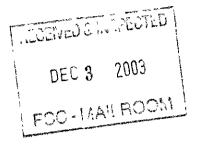
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The St. Lawrence Seaway Management Corporation Corporation de Gestion de la Voie Maritime du Saint-Laurent



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November 20, 2003

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Mr. John B. Muleta Chief, Wireless Telecommunications Bureau Federal Communications Commission The Portals 445 Twelfth Street, S.W. Washington, DC 20554

Gentlemen.

Ref: Maritel Emergency Petition (Public Notice (DA 03-3585); NTIA petition (RM-10821))

The St. Lawrence Seaway Management Corporation (SLSMC) and its U.S counterpart, the Saint Lawrence Seaway Development Corporation (SLSDC), has, with the support and financial contribution of the marine industry, successfully implemented mandatory carriage of shipborne Automatic Identification System effective since March 2003. The recent emergency petition by Maritel per Public Notice DA 03-3585, is of serious concern to the SLSMC.

The St. Lawrence Seaway navigation channel crosses the Canada-U.S. international boundary several times in the Montreal to Lake Ontario segment of the river, and, as a result, Vessel Traffic Services are provided, and have been provided since the start of the Seaway in 1959, by the U.S. Corporation (SLSDC) in Canadian waters and by the Canadian Corporation (SLSMC) in U.S. waters. Since 1998, both the Canadian and U.S. Seaway entities share commercial vessel transit information via a common database, and it is critical, for practical reasons, that vessels now mandated to carry AIS do so in a seamless and transparent way. The implementation of AIS has been an important milestone in providing the Vessel Traffic Services, in both the Canadian and U.S. with accurate and timely information to maximize the efficiency, security and safety of the system. In addition to providing vessel identification, position, speed and heading to shore-based stations and to other vessels in the vicinity, both AIS channels 87B and 88B are also used to provide critical information such as water levels, wind speed and direction, and other meteorological data. AIS has already proven itself in providing accurate information beyond the limitations of radar technology.

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International Maritime Organization (IMO) has adopted changes to the International Convention for Safety of Life at Sea (SOLAS) in support of its mission to promote marine safety. SOLAS has recognized AIS as a primary means for ship collision avoidance, and has designated channels 87B and 88B as the international maritime AIS frequencies. The IMO has also established a timetable to phase-in AIS mandatory carriage. The implementation of AIS in the jurisdictional waters of the Seaway Corporations was performed in accordance with this designation. Such a designation, world-wide, is important from a pragmatic and commercial point of view. Should Maritel be successful in its petition, commercial vessels may be faced not only with additional costs in order to comply a derogation to the international standard, but the AIS seamless system as it is today may be rendered unusable in the international section of the St. Lawrence River.

For these reasons, it is important that the NTIA and FCC rule to ensure that channels 87B and 88B are secured for primary federal government use so that they are fully available for use by the SLSDC for its St. Lawrence Seaway Automatic Identification System.

Richard Corfe

President and Chief Executive Officer

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